

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

NICHOLAS ROZDILSKY,

Plaintiff,

- vs -

LIQUIDITY SERVICES, INC.,

Defendant.

Civil Action No.:
TDC-22-3355

LIQUIDITY SERVICES, INC.,

Plaintiff,

- vs -

NICHOLAS ROZDILSKY,

Defendant.

Civil Action No.:
TDC-23-1653

PLAINTIFF ROZDILSKY'S MOTION TO COMPEL DISCOVERY

In accordance with Local Rule 104.8 and Rule 37(a) of the Federal Rules of Civil Procedure, Plaintiff Nicholas Rozdilsky hereby moves to compel discovery responses from Liquidity Services, Inc. (LSI) in both Case No. TDC-22-3355 and Case No. TDC-23-1653. For the reasons set forth in the accompanying Memorandum, Plaintiff Rozdilsky requests the Court to order LSI to provide full responses to Interrogatory Nos. 5 and 7 and Requests for Production of Documents Nos. 4, 10, 15, 16, 17, 20, 22, 23. Moreover, Rozdilsky requests that the Court impose an appropriate sanction on LSI, including but not limited to, Rozdilsky's reasonable attorney's fees and costs related to this discovery dispute. A proposed Order is also attached as an Exhibit for the Court's consideration.

Dated: July 26, 2024

Respectfully submitted,

/s/ Eric Bachman

Eric Bachman (MD Bar No. 16325)

BACHMAN LAW

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Counsel for Nicholas Rozdilsky

CERTIFICATE OF SERVICE

I hereby certify that on this 26th of July, 2024, I served a true and correct copy of Plaintiff's Motion to Compel Discovery on Defendant's counsel via electronic mail (as agreed to by Counsel for LSI):

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Counsel for Defendant LSI

/s/ Eric Bachman
Eric Bachman (MD Bar No. 16325)